EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

    Plaintiff,

  v.

RICHARD XIA, et al.,

    Defendants,

  and

JULIA YUE and XI VERFENSTEIN, et al.,

    Relief Defendants.

Case No.: 21-cv-5350 (PKC)(RER)

STATE OF NEW YORK   )
) :ss.
COUNTY OF QUEENS   )

AFFIDAVIT OF RICHARD XIA

  I, **Richard Xia**, submit this affidavit in response to the Court's November 29, 2023 Order

(The "November 2023 Order") relating to the above-captioned action:

1. I am the Defendant in the above-captioned matter.

2. I have maintained all responsive documents and communications at the following:

  location(s): 4231 Union Street, Flushing
  file(s): N/A
  computer(s): IMAC computer (year unknown)
  mobile device(s): multiple IPhones/versions 9-13
  email address(es): Richard.y.xia@fleetfinancialgroup.com, Richard.y.xia@fnymrc.com
  server(s): N/A

3. I have preserved all responsive documents and communications at the
locations/files/computers/mobile devices/email addresses identified in #2 above, where such

documents have been maintained. In order to preserve the referenced documents, no documents were deleted.

4.   I have conducted searches for responsive documents and communications in the following manner:

- In 2018, I gave all of my emails to KL Discovery to capture all responsive emails. I then instructed my lawyers at Greenberg Traurig to run searches for all responsive, non-privileged documents.
- In 2019 and 2023, I searched for responsive documents by searching my computer, phone, and hard-copy files, using the key words or key terms from each request made of me.

5.   I conducted searches for responsive documents by:

Same answer as Number 4 above.

6.   All responsive documents are still in my possession.

7.   I, Richard Xia, undertook the efforts to search for all responsive documents and communications.
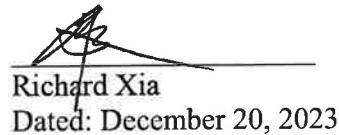
Richard Xia
Dated: December 20, 2023

Sworn to and Subscribed before me
this 20 day of December, 2023
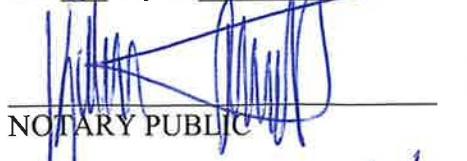
NOTARY PUBLIC

My Commission Expires: 02/02/2027

Katherine M Jaskot
NOTARY PUBLIC - NEW YORK
COMMISSION #
02JA0000179
MY COMM. EXPIRES
02/02/2027

2